

November 25, 1992



Mary Beth Novy, RPM U.S. Environmental Protection Agency 77 West Jackson Blvd., HSRW-6J Chicago, IL 60604

RE: OCTOBER 26, 1992 LETTER FROM THE MDNR CONTAINING AN INTEROFFICE COMMUNICATION DATED OCTOBER 20, 1992 REGARDING THE WORK PLAN FOR THE MAGNETOMETER SURVEY FOR THE ALBION-SHERIDAN TOWNSHIP LANDFILL

Dear Mary Beth:

WWES has reviewed the interoffice communication prepared by the MDNR regarding the WWES mini-work plan for the magnetometer survey for the Albion-Sheridan Township Landfill site. WWES would like to summarize the history leading up to the recommendation and implementation of the magnetometer survey.

During the Work Plan development stage, a meeting was held between U.S. EPA (Mary Beth Novy), the MDNR (Gene Hall, Robert Delaney, Jim Heizman) and WWES on June 4, 1992 at WWES' Grand Rapids office. Roger Noyce of the MDNR was included, via conference call, in the discussion of the geophysical investigation. With regard to the proposed geophysical survey, a tentative compromise was struck which included postponing the magnetometer survey until the landfilled areas were defined. The landfilled areas were subsequently defined in August using the EM-31.

The objectives and rationale for implementing the magnetometer survey are contained in the overall work plan for the Albion-Sheridan Township Landfill which was reviewed by the MDNR. The results of the EM-31 and EM-34 survey were sent to Gene Hall of the MDNR on September 3, 1992 and discussed with Gene Hall, Robert Delaney, and Roger Noyce from the MDNR on September 9, 1992 during an on-site meeting.

It was agreed during the on-site meeting that WWES would perform a magnetometer survey over four to six areas (selected by Roger Noyce at the meeting). An optional budget providing for two days of surveying had been incorporated into the original budget. It was stated at the meeting that the magnetometer survey would continue for

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two days and then be terminated whether the survey was complete or not. The WWES geophysicist was to walk over each of the areas to determine if it was clear enough of surface metal to allow reasonable interpretation of the results of the magnetometer survey. Two areas were determined to contain too much surface metal. Therefore, the work plan specified that the magnetometer survey would be performed over four of the previously selected areas.

The Work Plan outlining the agreed upon scope of work was received by the MDNR on October 14, 1992 and reviewed and comments incorporated in an interoffice communication by Chris Austin of the MDNR. Unfortunately, to our knowledge, Chris Austin has had no connection with the site to date. Our review of the interoffice communication leads us to believe that Chris Austin was not provided with the overall Work Plan, the results of the EM-31 and EM-34 survey, or any notes from the on-site meeting.

In his review of the work plan, Chris Austin is recommending a magnetometer survey of the entire area within the fill boundaries, an area of at least 20 acres, citing the success of a similar survey conducted at the Metamora Superfund Site.

There are obvious differences in site conditions and background information for the Metamora Site and the Albion Site that indicate the applicability and likely success of the magnetometer method to locate and estimate quantities of buried drums. The Metamora survey was conducted in 5 areas of the landfill that local citizens and an informant identified as drum disposal areas. The 5 areas surveyed totaled 8.9 acres. Two of the 5 areas occurred outside of the filled area where drums were visible from the surface or had been removed from an immediately adjacent area. Two others were within the filled area where drum disposal was known to have occurred and cover was thin. Only 1 of the 5 areas was within the filled area where refuse cover was thick and even here, witnesses had reported drum disposal activities. In effect, the Metamora survey was used to simply confirm witness information and to semi-quantitatively estimate the numbers of drums present, based on an estimated thickness of disposal obtained from actual excavation activities at the site.

In contrast, there are no reports or known evidence of systematic or concentrated drum disposal practices occurring at the Albion Site. That is not to say that scattered, randomly oriented drums are not present at various depths within the filled area, however, location of these drums using a magnetometer survey is most analogous to the least successful survey done at the Metamora site (within the thickest fill area and where results have not been verified by excavation) with the added disadvantage of having no background information identifying areas of drum disposal. Further, to determine if any ferrous metal

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anomalies were actually representative of buried drums, excavation of the landfill refuse would be required.

WWES believes that the investigation is proceeding in accordance with the RI/FS Guidance for CERCLA Municipal Landfill Sites (U.S. EPA, February 1991). To date, we have no confirmation or suspicions concerning the locations of drum nests.

We sense that while WWES and U.S. EPA agree with the merits of performing a limited magnetometer survey, individuals at the MDNR have not yet embraced the concept. The reluctance of the MDNR to concur with the performance of the magnetometer survey as described in the Work Plan and agreed upon during the on-site meeting is somewhat disturbing. We are at a loss as to how to remedy the apparent opposition of the MDNR over the magnetometer survey. We can only hope that this historical account of work plan development and implementation can refresh each participant's memory as to how the work plan emerged.

Until final resolution of this issue, we will assume that the work will progress in the well thought out manner described by the Work Plan. We feel this is much more prudent than revisiting the Work Plan with additional new staff members from the MDNR.

Please contact either of us if you require further assistance in this matter.

Sincerely yours,

WW ENGINEERING & SCIENCE, INC.

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